

REMARKS

This Amendment is in response to the Office Action mailed 05/02/2006. Reconsideration in light of the amendments and remarks made herein is respectfully requested.

Claim Rejections - 35 USC § 102

4. Claims 1-9, 11-14, 16-18 and 20-21 are rejected under 35 U.S.C. 102(a) as being anticipated by Stoica et al. ("Chord: A Scalable Peer-to-peer Lookup Service for Internet Applications").

5. In regard to claim 1, the Examiner asserts that Stoica discloses "the first network server to manage and maintain a first name-to-address resolution index that includes a list of addresses for the first plurality of peer devices" and the second network server "to manage and maintain a second name-to-address resolution index that includes a list of addresses for the second plurality of peer devices" citing Stoica, 150, lines 1-7. Applicant respectfully disagrees.

Stoica discloses a system that "provides support for just one operation: given a key, it maps the key onto a node." Stoica, Abstract. The system disclosed by Stoica can provide the functionality of a direct mapping between keys and values by storing each key/value pair at the node to which that key maps. Stoica, 149, seventh paragraph. A host name to IP address mapping can be provided with the name representing the key and the associated IP address representing the value. Stoica, 149, last paragraph. Thus, in the system disclosed by Stoica the address of each peer device is stored as a value in a key/value pair in which the key is the name of the peer device, the value is the address of the peer device, and the key/value pair is stored at the node to which that key maps, namely the peer device itself. This is entirely unlike the claimed system in which a server system maintains a name-to-address resolution index that includes a list of addresses for a plurality of peer devices.

Stoica discloses a system "that is fully distributed: no node is more important than any other." Stoica, 150, "Decentralization." This is entirely unlike the claimed system in which a server system is more important than a plurality of peer devices coupled to the server. Stoica discloses a system that "acts as a distributed hash function, spreading keys evenly over the nodes." Stoica, 150, "Load Balance." This is entirely unlike the claimed system in which a server system concentrates a list of addresses for a plurality of peer devices on a server. Stoica discloses a system that uses a consistent hashing algorithm to map keys to the nodes responsible for them; a lookup requires $O(\log N)$ messages. Stoica, 151, "4.1 Overview." This is entirely unlike the claimed system in which a second server queries a first server to obtain a peer device address of a peer device coupled to the first server.

6. In regard to claim 2, applicant has amended the claim to make clear that the pluralities of peer devices are under the servers to which they are coupled as disclosed in the Specification as filed on page 4, lines 32-34, clearly distinguishing the claimed invention from the disclosure of Stoica.

7. In regard to claim 3, applicant relies on the patentability of the claims from which this claim depends to traverse the rejection without prejudice to any further basis for patentability of this claim based on the additional elements recited.

8. In regard to claim 4, the Examiner asserts that Stoica discloses the second network server requires access authorization from the first network server before a common zone is established citing Stoica, 150, Availability. The cited portion of Stoica discloses adjusting of internal tables to accommodate changes in the attached nodes. Applicant does not understand this to disclose requiring access authorization prior to establishing a common zone.

9. In regard to claim 5, the Examiner asserts that Stoica discloses that the third network server is configured to respond to a request for a peer device address of one of the first plurality of peer devices by querying the second network server citing Stoica, 151, Distributed Indexes. The Examiner asserts that this was the operation of the Gnutella or Napster system. Nothing in Stoica discloses that the name server responds to a request for an address of a peer device that is coupled to another network server by querying the other network server to obtain and return the address of the peer devices. Stoica merely discloses that a key could be derived from the desired keywords, while values could be lists of machines offering documents with those keywords. Stoica discloses a mechanism for searching for keywords by forming a key from the keywords to find a list of machines offering documents with those keywords which is entirely unlike a system in which a third server obtains an address of a peer device coupled to a first server by querying a second server that in turn queries the first server.

10. In regard to claim 6, the Examiner asserts that Stoica discloses the additional elements of claim 6 in the same way that the additional elements of claim 5 are disclosed. Applicant respectfully submits that Stoica fails to disclose the additional elements of claim 6 in the same way that Stoica fails to disclose the additional elements of claim 5.

11. In regard to claim 7, the Examiner asserts that Stoica discloses the additional elements of claim 7 in the same way that the elements of claim 5 are disclosed. Applicant respectfully submits that Stoica fails to disclose the additional elements of claim 7 in the same way that Stoica fails to disclose the elements of claim 5.

12. The Examiner rejects claim 8 on the same basis as claim 1 and applicant likewise traverses the rejection on the same basis.

13. In regard to claim 9, applicant relies on the patentability of the claims from which this claim depends to traverse the rejection without prejudice to any further basis for patentability of this claim based on the additional elements recited.

14. The Examiner rejects claim 11 on the same basis as claim 2 and applicant likewise traverses the rejection on the same basis.

15. In regard to claim 12, applicant relies on the patentability of the claims from which this claim depends to traverse the rejection without prejudice to any further basis for patentability of this claim based on the additional elements recited.

16. The Examiner rejects claim 13 on the same basis as claim 4 and applicant likewise traverses the rejection on the same basis.

17. The Examiner rejects claim 14 on the same basis as claims 1 and 3 and applicant likewise traverses the rejection on the same basis.

18. The Examiner rejects claim 16 on the same basis as claim 4 and applicant likewise traverses the rejection on the same basis.

19. In regard to claim 17, the Examiner asserts that Stoica further discloses wherein there is no common zone relationship between the first server and the second server, and derivative common zone name-to-address resolution is selectively permitted by a server having common zone relationships with the first server and the second server citing Stoica, 151, Distributed Indexes. The Examiner asserts that this was the operation of the Gnutella or Napster system. Nothing in Stoica discloses selectively permitting a common zone relationship, which is an address sharing relationship as disclosed in the Specification as filed on page 7, lines 20-31.

20. The Examiner rejects claim 18 on the same basis as claim 1 and applicant likewise traverses the rejection on the same basis.

21. The Examiner rejects claim 20 on the same basis as claims 3 and 4. Applicant respectfully traverses the rejection of claim 20 on the same basis as claims 3 and 4.

22. The Examiner rejects claim 21 on the same basis as claim 17 and applicant likewise traverses the rejection on the same basis.

Applicant respectfully requests that the Examiner withdraw the rejection of claims 1-9, 11-14, 16-18 and 20-21 are rejected under 35 U.S.C. 102(a) as being anticipated by Stoica.

Claim Rejections - 35 USC § 103

24. The Examiner rejects claims 10, 15 and 19 under 35 U.S.C. § 103(a) as being unpatentable over Stoica, and further in view of Official Notice.

25. In regard to claims 10, 15 and 19, applicant relies on the patentability of the claims from which these claims depend to traverse the rejection without prejudice to any further basis for patentability of these claims based on the additional elements recited.

Applicant respectfully requests that the Examiner withdraw the rejection of claims 10, 15 and 19 under 35 U.S.C. § 103(a) as being unpatentable over Stoica and Official Notice.

Conclusion

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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